

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOHN DOMPIERRE, et al.

Defendant.

Case No. **CR 17-3246 MV**

**DEFENDANT JOHN DOMPIERRE'S UNOPPOSED MOTION
FOR MODIFICATION OF CONDITIONS OF RELEASE**

COMES NOW Defendant JOHN DOMPIERRE, by and through legal counsel Barry G. Porter, and pursuant to U.S. Const. amend. VIII, 18 U.S.C. 3145 (b) and 18 U.S.C § 3142 requests a modification of his current conditions of release ordered on April 24, 2018 in the United States District Court for the District of Arizona. Specifically, John Dompierre requests that he be allowed access to a computer and be allowed access to the Internet.

In support of this motion, defense counsel states:

1. Mr. Dompierre is charged with Attempt and Conspiracy to Commit Sex Trafficking of Minors, Attempt and Conspiracy to Transport Minors to Engage in Criminal Sexual Activity and Sex Trafficking of Minors, Aiding and Abetting.
2. None of the factual allegations related to Mr. Dompierre involve use of a computer or the internet.

3. Mr. Dompierre is lives in Arizona and was arrested in Arizona. He was released to pre-trial supervision by United States District Court in Arizona in April 24, 2018. An Order Setting Conditions of Release was filed April 27, 2018 in the Unites States District Court Arizona-Phoenix. That Order, on page four, restricts Mr. Dompierre access to any device allowing access to the Internet.
4. One of Mr. Dompierre's conditions of release is that he is on location monitoring at the discretion of the pre-trial supervision officer.
5. Mr. Dompierre has been in full compliance with his pre-trial conditions of release.
6. Counsel has been in contact with USPO Gilbert Lara from Arizona and USPO Daniel Stewart from New Mexico. Both have no opposition to the relief requested in this Motion.
7. Counsel consulted with AUSA George Kraehe and he has no objection to this motion, highlighting that Mr. Dompierre must comply with all other conditions release and have no contact with the alleged victims in this matter.
8. All other outstanding conditions of Mr. Dompierre's release would remain in place.
9. All codefendant's counsel have no opposition to the relief requested in this motion.

WHEREFORE, John Dompierre, requests that his conditions of release be modified to allow him to use computers and to have access to the Internet. All other conditions of release to remain the same.

Respectfully Submitted,

BURGESS & PORTER LLC

By: /s/ Barry G. Porter
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I filed the foregoing electronically through the CM/ECF system, which caused all parties to this case to be served notice of the document by electronic delivery. Pursuant to Local Rule of Criminal Procedure, Rule 47.3, a copy of this motion was also served upon the U.S. Probation and Pretrial Services Office via the CM/ECF system.

/s/ Barry G. Porter
BURGESS & PORTER LAW, LLC